IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16-cv-489-CWR-JCG

HINDS COUNTY, ET AL

DEFENDANTS

NOTICE OF DEPOSITIONS

TO: ALL COUNSEL OF RECORD

Please take notice that counsel for the United States of America, plaintiff in the above-styled and numbered cause of action, will take the depositions of the following individuals at the United States Attorney's Office, Southern District of Mississippi, 501 East Court Street, Suite 4.430, Jackson, MS 39201, on the dates and times indicated:

Major Mary Rushing September 17, 2019, 9:00 a.m. Central Standard Time (CST)

Captain Sandra Dalton September 18, 2019, 9:00 a.m. CST

Captain Ric Fielder September 18, 2019, 1:30 p.m. CST

Robert Bell September 19, 2019, 9:00 a.m. CST

Captain Terry Miller September 19, 2019, 1:30 p.m. CST

Fernandeis Frazier September 20, 2019, 9:00 a.m. CST

Pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, the depositions will be taken before a Notary Public or duly authorized officer, authorized to administer oaths.

The deposition will be taken by stenographic means. You are invited to attend and participate.

Pursuant to Fed. R. Civ. P. 30 and 45, the deponent is also requested to bring to the deposition the following documents:

- 1. Deponent's most recent curriculum vitae or resume.
- 2. Deponent's most current job description.
- 3. Any notes, instructions, correspondence, or other records that the deponent reviewed in preparation for his deposition.
- A copy of any policies, protocols, training materials, or standards that the deponent consults, uses, or relies on regularly in connection with deponent's duties at the Jail.

Dated: September 6, 2019

D. MICHAEL HURST, JR. United States Attorney Southern District of Mississippi ERIC S. DREIBAND **Assistant Attorney General** Civil Rights Division

STEVEN H. ROSENBAUM Chief

/s/ Candace Mayberry CANDACE MAYBERRY Assistant United States Attorneys 501 E. Court Street, Suite 4.430 Jackson, MS 39201 Telephone: (601) 973-2840

mitzi.paige@usdoj.gov

candace.mayberry@usdoj.gov

LAURA L. COWALL Special Counsel

/s/ Christopher N. Cheng CHRISTOPHER N. CHENG [PA Bar 69066] AARON S. FLEISHER SARAH RUSSO **Trial Attorneys Special Litigation Section** Civil Rights Division U.S. Department of Justice 950 Pennsylvania Avenue, N.W. - PHB Washington, DC 20530 Telephone: (202) 514-8892

christopher.cheng@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Candace G. Mayberry
CANDACE G. MAYBERRY (MS #104014)
Assistant U.S. Attorney
U.S. Attorney's Office
Southern District of Mississippi
501 E. Court Street – Ste. 4.430
Jackson, MS 39201
candace.mayberry@usdoj.gov
(601) 973-2838
(601) 965-4409 (fax)